

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

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U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST. DIV. COLUMBUS

UNITED STATES OF AMERICA,

Plaintiff,

v.

TIMOTHY W. WRIGHT

Defendant.

CASE NO. 2:21-cr-177

CHIEF JUDGE MARBLEY

18 U.S.C. §§ 2251(a) & (e)

18 U.S.C. § 2422(b)

18 U.S.C. §§ 2252(a)(2) and (b)(1)

18 U.S.C. §§ 2252(a)(4)(B) and (b)(2)

18 U.S.C. §§ 2253(a)(1) and (3)

FORFEITURE

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(Sexual Exploitation of a Minor)

Between April 2021 and May 2021, the exact dates being unknown to the Grand Jury, in the Southern District of Ohio, the defendant, **TIMOTHY W. WRIGHT**, did employ, use, persuade, induce, entice, and coerce a minor, specifically Jane Doe 1, an approximately fifteen-year-old female, to engage in sexually explicit conduct as defined in 18 U.S.C. § 2256(2)(A), for the purpose of producing and attempting to produce any visual depiction of such conduct, to wit: one or more video files depicting Jane Doe 1 engaged in the lascivious display of genitalia and masturbation; the production of such visual depictions using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, specifically cellular phones that were manufactured in whole or in part outside of the state of Ohio; and such visual depiction actually was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of 18 U.S.C. §§ 2251(a) & (e).

COUNT TWO

(Sexual Exploitation of a Minor)

In or about June 2021, the exact dates being unknown to the Grand Jury, in the Southern District of Ohio, the defendant, **TIMOTHY W. WRIGHT**, did employ, use, persuade, induce, entice, and coerce a minor, specifically Jane Doe 2, an approximately seventeen-year-old female, to engage in sexually explicit conduct as defined in 18 U.S.C. § 2256(2)(A), for the purpose of producing and attempting to produce any visual depiction of such conduct, to wit: one or more digital video files depicting Jane Doe 2 engaged in the lascivious display of genitalia; the production of such visual depictions using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, specifically cellular phones that were manufactured in whole or in part outside of the state of Ohio; and such visual depiction actually was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of 18 U.S.C. §§ 2251(a) & (e).

COUNT THREE

(Sexual Exploitation of a Minor)

On or about February 13, 2021, in the Southern District of Ohio, the defendant, **TIMOTHY W. WRIGHT**, did employ, use, persuade, induce, entice, and coerce a minor, specifically Jane Doe 3, an approximately thirteen-year-old female, to engage in sexually explicit conduct as defined in 18 U.S.C. § 2256(2)(A), for the purpose of producing and attempting to produce any visual depiction of such conduct, to wit: one or more image and/or video files depicting Jane Doe 3 engaged in the lascivious display of genitalia and masturbation; the production of such visual depictions using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, specifically cellular

phones that were manufactured in whole or in part outside of the state of Ohio; and such visual depiction actually was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of 18 U.S.C. §§ 2251(a) & (e).

COUNT FOUR

(Sexual Exploitation of a Minor)

On or about February 13, 2021, in the Southern District of Ohio, the defendant, **TIMOTHY W. WRIGHT**, did employ, use, persuade, induce, entice, and coerce a minor, specifically Jane Doe 4, an approximately fourteen-year-old female, to engage in sexually explicit conduct as defined in 18 U.S.C. § 2256(2)(A), for the purpose of producing and attempting to produce any visual depiction of such conduct, to wit: one or more image and/or video files depicting Jane Doe 4 engaged in the lascivious display of genitalia and masturbation; the production of such visual depictions using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, specifically cellular phones that were manufactured in whole or in part outside of the state of Ohio; and such visual depiction actually was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of 18 U.S.C. §§ 2251(a) & (e).

COUNT FIVE

(Coercion and Enticement of a Minor)

Between in or about February 2021 and in or about June 2021, the exact dates being unknown to the Grand Jury, in the Southern District of Ohio, the defendant, **TIMOTHY W. WRIGHT**, using any means and facility of interstate and foreign commerce, including the internet and a cellular phone, did knowingly persuade, induce, entice, and coerce an individual,

Jane Doe 1, who had not attained the age of 18 years of age, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, including Section 2907.04 of the Ohio Revised Code (Unlawful Sexual Conduct with a Minor) and 18 U.S.C § 2251 (Sexual Exploitation of a Minor).

In violation of 18 U.S.C. § 2422(b).

COUNT SIX

(Coercion and Enticement of a Minor)

Between June 2021 and July 2021, the exact dates being unknown to the Grand Jury, in the Southern District of Ohio, the defendant, **TIMOTHY W. WRIGHT**, using any means and facility of interstate and foreign commerce, including the internet and a cellular phone, did knowingly persuade, induce, entice, and coerce an individual, Jane Doe 2, who had not attained the age of 18 years of age, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, including 18 U.S.C § 2251 (Sexual Exploitation of a Minor).

In violation of 18 U.S.C. § 2422(b).

COUNT SEVEN

(Coercion and Enticement of a Minor)

Between in or about February 2021 and in or about March 2021, the exact dates being unknown to the Grand Jury, in the Southern District of Ohio, the defendant, **TIMOTHY W. WRIGHT**, using any means and facility of interstate and foreign commerce, including the internet and a cellular phone, did knowingly persuade, induce, entice, and coerce an individual, Jane Doe 5, who had not attained the age of 18 years of age, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, including Section 2907.21 of the Ohio Revised Code (Compelling Prostitution).

In violation of 18 U.S.C. § 2422(b).

COUNT EIGHT

(Receipt of Child Pornography)

On or about April 29, 2021, in the Southern District of Ohio, the defendant, **TIMOTHY W. WRIGHT**, did knowingly receive one or more visual depictions using any means and facility of interstate and foreign commerce, including cellular phones, the production of such visual depictions having involved the use of a minor engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), and such depictions being of such conduct, to wit: digital video files depicting Jane Doe 1 engaged in the lascivious display of the genitalia and masturbation.

In violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT NINE

(Receipt of Child Pornography)

On or about May 2, 2021, in the Southern District of Ohio, the defendant, **TIMOTHY W. WRIGHT**, did knowingly receive one or more visual depictions using any means and facility of interstate and foreign commerce, including cellular phones, the production of such visual depictions having involved the use of a minor engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), and such depictions being of such conduct, to wit: a digital video file depicting Jane Doe 1 engaged in the lascivious display of the genitalia.

In violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT TEN

(Receipt of Child Pornography)

On or about June 9, 2021, in the Southern District of Ohio, the defendant, **TIMOTHY W. WRIGHT**, did knowingly receive one or more visual depictions using any means and

facility of interstate and foreign commerce, including cellular phones, the production of such visual depictions having involved the use of a minor engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), and such depictions being of such conduct, to wit: a digital video file depicting Jane Doe 2 engaged in the lascivious display of the genitalia.

In violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT ELEVEN

(Receipt of Child Pornography)

On or about June 14, 2021, in the Southern District of Ohio, the defendant, **TIMOTHY W. WRIGHT**, did knowingly receive one or more visual depictions using any means and facility of interstate and foreign commerce, including cellular phones, the production of such visual depictions having involved the use of a minor engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), and such depictions being of such conduct, to wit: digital video files depicting Jane Doe 2 engaged in the lascivious display of the genitalia.

In violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT TWELVE

(Possession of Child Pornography)

On or about August 2, 2021, in the Southern District of Ohio, the defendant, **TIMOTHY W. WRIGHT**, knowingly possessed matter, that is, digital image and video files stored on an Apple iPhone X, which contained one or more visual depictions that had been transported using any means and facility of interstate and foreign commerce, the production of such visual depictions having involved the use of minors engaging in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A).

In violation of 18 U.S.C. §§ 2252(a)(4)(B) and (b)(2).

FORFEITURE ALLEGATION

The allegations of Counts One through Nine of this Indictment are hereby incorporated by reference as if fully rewritten herein for purposes of alleging forfeitures to the United States of America, pursuant to 18 U.S.C. § 2253.

As a result of the offenses alleged in Counts One through Nine of this Indictment and upon conviction thereof, the defendant, **TIMOTHY W. WRIGHT**, shall forfeit to the United States his interest in any property, real or person, involved in such offense, and any property traceable to such property, including but not limited:

(a) all matter containing said visual depictions or child pornography and child erotica, transported, mailed, shipped and possessed in violation thereof; and,

(b) all property used and intended to be used to commit and to promote the commission of the aforementioned violations including but not limited to the following:

1. One Apple iPhone X, bearing serial number G0NW2EV0JCL8, and ISMI number 310410066384069.

Forfeiture in accordance with 18 U.S.C. §§ 2253(a)(1) and (3) and Rule 32.2 of the Federal Rules of Criminal Procedure.

A TRUE BILL.

s/ Foreperson _____

GRAND JURY FOREPERSON

**VIPAL J. PATEL
ACTING UNITED STATES ATTORNEY**



EMILY CZERNIEJEWSKI (IL 6308829)
Assistant United States Attorney